

# EXHIBIT F

**UNITED STATES of AMERICA**  
**VS**  
**METHODIST LE BONHEUR HEALTHCARE, et al.**

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**CHRIS MCLEAN**

**August 11, 2022**



**Terri Beckham, RPR, RMR, CRR**

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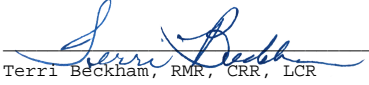
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1 dollar, but approximately how much lower were the  
 2 professional collections in Exhibit 71 than  
 3 Exhibit 70?  
 4 **A. Okay. To do that I would need to do math,**  
 5 **which I'm willing to do if that's what you're**  
 6 **asking.**  
 7 Q. Yeah, that's what I'm asking.  
 8 **A. Okay. Can I have a piece of paper?**  
 9 MS. SWEET: Do you want -- I was going  
 10 to say do you want -- do you have a calculator?  
 11 **THE WITNESS: If I'm ballparking, I'm**  
 12 **going to do it --**  
 13 MS. SWEET: Okay.  
 14 **THE WITNESS: -- in my head.**  
 15 **If we need to get a specific**  
 16 **calculation, I can do that too, if need be.**  
 17 **So just so you know, what I'm doing is**  
 18 **I'm going to compare answer 7 between the two for**  
 19 **those two categories and come up with a reasonable**  
 20 **estimate of the differences.**  
 21 MS. SWEET: You also have to do it for 9  
 22 as well.  
 23 MR. ROARK: Right.  
 24 BY MR. ROARK:  
 25 Q. It's 7 and 9.

1 **A. 7 and 9, correct. Correct. So let me figure**  
 2 **out a good way to do the math.**  
 3 (Pause in proceedings.)  
 4 **THE WITNESS: I'll mess up you all's**  
 5 **books.**  
 6 MS. SWEET: He's writing on that?  
 7 That's okay.  
 8 MR. ROARK: No, he just took out a page  
 9 from the exhibits so he can compare.  
 10 **THE WITNESS: Okay. So I did make the**  
 11 **comparisons, each of those various schedules between**  
 12 **the two. And I come up with around \$19.7 million,**  
 13 **rounded, difference between the first set of**  
 14 **interrogatories and the second set of**  
 15 **interrogatories. So that's the math I calculate.**  
 16 BY MR. ROARK:  
 17 Q. So the total estimated professional  
 18 collections in Exhibit 71 is about \$19.7 million  
 19 lower than Exhibit 70?  
 20 **A. Yes, that's what I calculated.**  
 21 MR. ROARK: That's all that I have.  
 22 MS. SWEET: Okay.  
 23 MR. VROON: Are you talking about all  
 24 physicians --  
 25 MS. SWEET: No, it's --

1 MR. VROON: -- or oncologists?  
 2 **THE WITNESS: I compared -- there's two**  
 3 **categories, 7 and 9. I compared 7 --**  
 4 MR. ROARK: Hold on. Mr. Vroon can't  
 5 ask you questions today.  
 6 MR. VROON: I'm just trying to clarify,  
 7 because you didn't say whether it was calculating  
 8 No. 7 or No. 9, Brian. I wanted to know.  
 9 MR. ROARK: Kara clarified. And I'm  
 10 happy to put it on the record.  
 11 BY MR. ROARK:  
 12 Q. Mr. McLean, when you -- the numbers that  
 13 you're comparing, does that include the professional  
 14 collections from the answer to Interrogatory No. 7  
 15 and Interrogatory No. 9?  
 16 **A. Yes.**  
 17 MR. ROARK: All right. That's all.  
 18 THE VIDEOGRAPHER: We are going off the  
 19 record at 6:00 p.m.  
 20 FURTHER DEPONENT SAITH NOT  
 21 (Proceedings concluded at 6 p.m.)  
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1 REPORTER'S CERTIFICATE  
 2  
 3 STATE OF TENNESSEE  
 4 COUNTY OF Davidson  
 5  
 6 I, Terri Beckham, RMR, CRR, and licensed  
 7 Court Reporter, with offices in Nashville,  
 8 Tennessee, hereby certify that I reported the  
 9 foregoing deposition of CHRIS MCLEAN by machine  
 10 shorthand to the best of my skills and abilities,  
 11 and thereafter the same was reduced to typewritten  
 12 form by me. I am not related to any of the parties  
 13 named herein, nor their counsel, and have no  
 14 interest, financial or otherwise, in the outcome of  
 15 the proceedings.  
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E R R A T A

I, CHRIS MCLEAN, having read the foregoing deposition, pages 1 through 340, taken August 11, 2022, do hereby certify said testimony is a true and accurate transcript, with the following corrections, if any:

PAGE	LINE	SHOULD HAVE BEEN
<u>26</u>	<u>15</u>	<u>years</u>
<u>31</u>	<u>20</u>	<u>the rolled should be their old</u>
<u>33</u>	<u>2</u>	<u>separately</u>
<u>40</u>	<u>21</u>	<u>define</u>
<u>46</u>	<u>5</u>	<u>would should be old</u>
<u>66</u>	<u>13</u>	<u>340B</u>
<u>67</u>	<u>5</u>	<u>level of expertise</u>
<u>69</u>	<u>19</u>	<u>can't</u>
<u>70</u>	<u>16</u>	<u>included</u>
<u>89</u>	<u>3-4</u>	<u>specific parts of</u>
<u>114</u>	<u>19</u>	<u>West had done</u>
<u>119</u>	<u>11</u>	<u>annual should be management</u>
<u>120</u>	<u>18</u>	<u>end of should be in</u>

  
CHRIS MCLEAN

  
Notary Public

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PAGE	LINE	SHOULD HAVE BEEN
<u>123</u>	<u>7</u>	<u>Mosaig</u>
<u>140</u>	<u>18</u>	<u>West was paid</u>
<u>153</u>	<u>4</u>	<u>Mosaig</u>
<u>181</u>	<u>6</u>	<u>contracts</u>
<u>207</u>	<u>7</u>	<u>Mosaig</u>
<u>251</u>	<u>2</u>	<u>Mosaig</u>
<u>266</u>	<u>18</u>	<u>Mosaig</u>
<u>271</u>	<u>25</u>	<u>in MRPC</u>
<u>287</u>	<u>13-14</u>	<u>I do should be do I</u>
<u>294</u>	<u>13</u>	<u>analyses</u>
<u>324</u>	<u>24</u>	<u>Mosaig</u>
<u>325</u>	<u>5</u>	<u>Mosaig</u>
<u>325</u>	<u>15</u>	<u>Mosaig</u>

Chris McLean  
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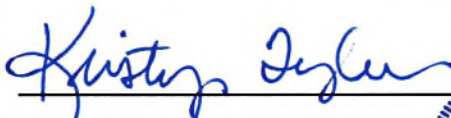
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<u>325</u>	<u>21</u>	<u>Mosaiq</u>
<u>326</u>	<u>8</u>	<u>know whether</u>
<u>328</u>	<u>18</u>	<u>Mosaiq</u>
<u>334</u>	<u>4</u>	<u>Mosaiq</u>
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